

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	BANKRUPTCY CASE NO. 16-11100-TPA
	:	
Milford Eugene Rimer III and	:	
Connie Lynn Rimer,	:	CHAPTER 13
Debtor,	:	
	:	DOCKET NO.: 114
Connie Lynn Rimer,	:	
Movant,	:	
	:	
vs.	:	
	:	
Ford Motor Credit Company,	:	
	:	
And	:	
	:	
Ronda J. Winnecur, Esquire,	:	
Chapter 13 Trustee,	:	
Respondents.	:	

CERTIFICATE OF NO OBJECTION REGARDING MOTION TO AVOID

The undersigned hereby certifies that, as of the date hereof, no Answer, Objection or other Responsive Pleading to the MOTION TO AVOID AND CANCEL A JUDGMENT LIEN WITH FORD MOTOR CREDIT COMPANY, filed on February 24, 2021, has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no Answer, Objection or other Responsive Pleading to the Motions appears thereon. Pursuant to the Notice of Hearing, Objections to the Motion were to be filed and served no later than March 13, 2021.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Date: March 15, 2021

Respectfully submitted,
/s/ Daniel P. Foster, Esquire
Daniel P. Foster
PA I.D. # 92376
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Attorney for Debtor

CERTIFICATE OF SERVICE

I, the undersigned Paralegal of Foster Law Offices, certify under penalty of perjury that I am more than 18 years of age, and that I served a true and correct copy of the CERTIFICATE OF NO OBJECTION, by Certified Mail, U.S. Postage Paid on the parties below*.

Executed on: March 15, 2021

By: /s/ Kristen N. Dennis

Kristen N. Dennis, PARALEGAL
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MATRIX

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Ronda J. Winnecour
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